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8 *Attorneys for Defendant Tesla, Inc.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JOSHUA J. GODHART, individually,

12 Plaintiff,

13 vs.

14 TESLA, INC., a Delaware corporation,

15 Defendant.

Case No.: 2:19-cv-01541-JAD-VCF

**DEFENDANT TESLA, INC.'S MOTION TO
EXTEND DEADLINE TO FILE ANSWER
OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

(First Request)

16 Defendant TESLA, INC., by and through its counsel Jackson Lewis P.C., hereby brings the
17 instant Motion to Extend the Deadline to File Answer or Otherwise Respond to Plaintiff's
18 Complaint, by one week, up to and including October 7, 2019. This Motion is submitted and based
19 on the following:

20 1. This is the first request for an extension of time for Defendant to file its answer or
21 otherwise respond to Plaintiff's Complaint (ECF No. 1).

22 2. Defendant's response to Plaintiff's Complaint is currently due on Monday,
23 September 30, 2019.

24 3. Due to Defense Counsel's recent engagement to defend the case, preexisting
25 obligations, and a need to review additional information concerning this matter, a short additional
26 amount of time is necessary to review the Complaint and prepare a response.

27 4. Defendant attempted to obtain Plaintiff's consent to the aforementioned request for
28

1 an extension, however, Plaintiff declined to agree to such a stipulation. **Exhibit A.** Instead, Plaintiff
2 stated that "I am not opposed to you requesting an extension from the Court on behalf of your
3 Client. The Court may be obliged to allow an extension in these matters."

4 5. Accordingly, Defendant respectfully requests the Court to enter an order extending
5 the time in which to answer or otherwise respond to Plaintiff's Complaint by one week to and
6 including **October 7, 2019.**

7 6. Furthermore, this request for an extension of time to file Defendant's answer or
8 otherwise response to Plaintiff's Complaint is made in good faith and not for the purpose of delay,
9 and Defendant does not intend to waive any claim or defense in making this Motion.

10 DATED this 30th day of September, 2019.

11 JACKSON LEWIS P.C.

12 /s/ Joshua A. Sliker

13 DEVERIE J. CHRISTENSEN, ESQ.

14 Nevada Bar No. 6569

15 JOSHUA A. SLIKER, ESQ.

16 Nevada Bar No. 12493

17 300 S. Fourth Street, Ste. 900

18 Las Vegas, Nevada 89101

19 *Attorneys for Defendant*

20 *Tesla, Inc.*

21 **ORDER**

22 IT IS SO ORDERED:

23 

24 United States Magistrate Judge

25 10-1-2019

26 Dated: _____

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of Jackson Lewis P.C. and that on this 30th day of
3 September, 2019, I caused to be served a true and correct copy of the above and foregoing
4 **DEFENDANT TESLA, INC.'S MOTION TO EXTEND DEADLINE TO FILE ANSWER OR**
5 **OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)**, via the U.S.
6 District Court, District of Nevada's CM/ECF electronic filing and service system, to:
7

8 Joshua J. Godhart
9 848 N. Rainbow Blvd.
10 Las Vegas, Nevada 89107
11 jgodhart@gmail.com

12 *Plaintiff Pro Se*

13 /s/ Joshua A. Sliker
14 Employee of Jackson Lewis P.C.
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EXHIBIT A

EXHIBIT A

Email Correspondence between Plaintiff and
Defendant's Counsel

EXHIBIT A

Sliker, Joshua A. (Las Vegas)

From: J. Godhart <jgodhart@gmail.com>
Sent: Monday, September 30, 2019 6:38 PM
To: Sliker, Joshua A. (Las Vegas)
Subject: Re: Godhart v. Tesla

Mr. Sliker,

I decline to agree with the proposed stipulation. However, I am not opposed to you requesting an extension from the Court on behalf of your Client. The Court may be obliged to allow an extension in these matters.

Respectfully,

Joshua Godhart

"Do not humble yourself to be honored; but
rather; be honored to humble yourself." - Joshua Godhart

Sent from Android Phone

On Mon, Sep 30, 2019, 6:57 AM Sliker, Joshua A. (Las Vegas) <Joshua.Sliker@jacksonlewis.com> wrote:

Mr. Godhart,

We would like to request a one week extension of time to file our response to your complaint. Attached is a proposed stipulation for filing with the court. If all meets with your approval, please advise whether we are authorized to apply your e-signature.

We appreciate your professional courtesy. Thank you.

Joshua A. Sliker
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